

1 INTRODUCTION/OVERVIEW

1.4 Definitions

Effective: 06/1/98 Revised: 05/01/03

For the purpose of the Wisconsin WIC Program Operations, the following definitions apply.

<u>Abuse</u> The improper use of the WIC Program drafts by a participant, parent, guardian, proxy, project or vendor. Improper use includes buying foods not listed on the WIC approved food list, returning WIC foods for credit or exchange for unauthorized foods, accepting and processing WIC drafts from an unauthorized vendor, selling drafts, etc. Abuse of the WIC Program drafts may result in prosecution under federal law and suspension/termination from the WIC Program.

Actual Priority The determination made through a completed nutrition assessment and subsequent placement into the appropriate level of nutritional risk (I-VI).

Administrative Rules Laws that govern the activities of authorized vendors.

<u>ADP</u> The Automated Data Processing (ADP) system which produces drafts, draft issuance records, participant records, and management information reports. The ADP system and services are provided by an ADP contractor at a central processing center.

Adjunctive Eligibility Applicants are automatically income eligible for the WIC Program if the applicant meets any of the following: has documentation as certified as fully eligible to receive benefits from Food Stamp Program, Medicaid, Wisconsin Works (W-2), Temporary Assistance to Needy Families (TANF), or the Food Distribution Programs on Indian Reservations; has documented presumptive eligibility for Medicaid; is a member of a family which includes a W-2 or TANF recipient, or pregnant woman or an infant receiving Medicaid; or is a child receiving Medicaid.

<u>Allowable Costs</u> Expenses that are reasonable and necessary for efficient administration of the WIC Program.

<u>Anthropometry</u> The study and techniques of measuring characteristics of the human body, such as height and weight.

<u>Applicant</u> An individual who requests to receive WIC Program benefits, including those applying for benefits for the first time and those applying for continuation of benefits (recertifications).

<u>Bimonthly Draft Issuance</u> A system of offering food drafts to participants for a two month period.



<u>Breastfed Infant</u> An infant fed any amount of breastmilk on the average of at least once a day.

Breastfeeding Dyad A breastfed infant and the breastfeeding mother.

<u>Breastfeeding Promotion and Support</u> Expenses and activities related to the promotion of breastfeeding to pregnant women and the support of breastfeeding women.

<u>Breastfeeding Woman</u> A woman, up to one year postpartum, who is feeding breastmilk to her infant on the average of at least once a day.

<u>Budget</u> Document prepared to plan expenditures for the contract period. The budget details planned expenditures by certain operational categories, i.e., personnel, contractual services, operations, etc., and by service categories, i.e., nutrition education, client services, breastfeeding promotion and support, and administration.

Budget Narrative A document prepared to describe in detail the items on the budget.

<u>Capital Equipment</u> Property having a useful life of more than one year and an acquisition cost of \$1,000 or more per unit. Acquisition cost means the net invoice unit price of the property including the cost of installation, modification, attachments, accessories, or auxiliary apparatus necessary to make the property usable for the purpose for which it was acquired.

<u>Caregiver</u> A caregiver is anyone who assumes parental responsibilities due to the parent's absence. This is usually an informal arrangement as the parent is unable or unwilling to fulfill the parental responsibilities due to substance abuse, incarceration, neglect, illness, other crises, etc. The spouse of a caregiver may be considered a caregiver. Other adults who live in the household, considered as taking on the parental role, but are not married to the parent, are considered caregivers. Caregivers are not childcare providers or babysitters. Caregivers are not usually legal guardians. For example, a grandmother may be raising her offspring's child(ren) and has not sought legal guardianship. The grandmother is fully responsible for care of the child, not just babysitting for the child. See definitions for guardian, parent and proxy.

Caseload

<u>Contracted caseload</u> The number of potential participants a local WIC project is authorized by the State WIC Agency to serve each month in the contract period.

<u>Caseload count or Participating caseload</u> The number of WIC participants who receive drafts for one calendar month and breastfed infants whose mother is participating. PC and systems counts provide the numbers of participants who are actively participating in the program.



<u>Categorical Eligibility</u> Meeting the definition of pregnant, breastfeeding or postpartum women, infants or children up to age five.

<u>Categorical Ineligibility</u> Persons who do not meet the definition of pregnant, breastfeeding, or postpartum women, infants or children up to age five.

<u>Certification</u> The use of criteria and procedures to assess and document each applicant's eligibility for the WIC Program. If eligible and of a priority being served, the applicant is certified, enrolled, and given Program benefits.

<u>Children</u> Persons who have had their first birthday but have not yet reached their fifth birthday.

<u>Civil Rights</u> Legislation, policies and procedures designed to prevent and eliminate unlawful discrimination and to ensure equal treatment and opportunities for beneficiaries of federal financial assistance.

<u>Client Services</u> All allowable costs expended to deliver food, and other services and benefits to participants.

<u>Clinic</u> A facility where participants are certified. Also called a certification clinic.

<u>Competent Professional Authority</u> (CPA) Those individuals who determine nutritional risk and prescribe supplemental foods. The professional qualifications required of competent professional authorities are specified in the Administration Chapter.

<u>DAISy (Decentralized Automated Information System)</u> The personal computer (PC) version of the ADP system. Local projects maintain PC drafts, participant processing, and communicate with the mainframe via telephone or diskette.

<u>Data Collection Form</u> Used to document eligibility, nutrition and health information on DAISy. Also known as the Wisconsin WIC Data Collection Form.

Days Calendar days, except for those time standards which specify working days.

<u>Discrimination</u> An act, practice, policy or instance of treating an individual or group of individuals differently, by providing or refusing services based on an individual's race, color, national origin, age, sex or handicap.

<u>Drafts</u> The food instruments used by participants to purchase authorized supplemental foods. The drafts are standard statewide. Drafts are issued from the DAISy PC program ("PC drafts"). "Drafts" is also a banking term indicating that there is an edit process, e.g., for prices, valid vendor number, etc.



<u>Draft Issue Date</u> The date the participant (or proxy) is scheduled to pick up drafts. This date, also called "Pick-Up Day," is coded on the Wisconsin WIC Data Collection Form. The pick-up day may be specified as monthly, bimonthly or trimonthly. These dates are automatically printed on the draft as "First Date to Use" and "Last Date to Use." The participant has 30 days from the "First Date to Use" printed on the draft to cash the drafts.

<u>Dual Participation</u> Simultaneous participation in the Program in more than one local WIC project, or in more than one issuance clinic within a local WIC Project.

<u>Economic Unit</u> A household or economic unit composed of a person or a group of persons related or unrelated who usually (although not necessarily) live together, and whose production of income and consumption of goods are related. Members of an institution are not considered a family or economic unit.

<u>Eligible</u> A person who is (a) categorically eligible, (b) income eligible, (c) a resident of a WIC project service area, and (d) at nutritional risk. This person may be enrolled in WIC and receive drafts, or may be put on a waiting list until the project has the capacity to serve additional participants.

<u>Enroll</u> The process of adding an eligible person to the program to receive WIC drafts.

<u>Family</u> A household or economic unit is composed of a person or group of persons related or unrelated who usually (although not necessarily) live together, and whose production of income and consumption of goods are related. Exceptions include residents of an institution or a homeless facility, who may not all be considered members of a single family.

<u>Family Size</u> The number of individuals in the family (see above). The applicant pregnant woman is assessed based on a family size increased by the number of expected births. The family size and total income of the family are used to determine income eligibility.

<u>Federal Poverty Income Level</u> Individuals whose gross family income is equal to or less than 185 percent of the U.S. Department of Health and Human Services poverty income guidelines updated every July 1.

<u>Fiscal Period</u> Any period defined by a starting calendar date and ending calendar date for the purpose of accumulating financial transactions occurring within that period.

<u>Fiscal Year (FY)</u> A period starting on any calendar date and continuing for twelve consecutive months for the purpose of accumulating financial transactions occurring with that period. The Federal Fiscal Year (FFY), which the WIC Program must use, is October 1 through September 30.



Five Guiding Principles:

- a. Family centered services means involving families in program development.
- b. Services should be culturally competent, respecting the diversity of beliefs and traditions.
- c. Community-wide leadership includes community members in discussions of the program.
- d. The health promotion approach uses prevention strategies that are shaped around strengths present in the community.
- e. Outreach and needs assessment means providing services to citizens with the greatest need.

<u>Food Delivery System</u> The method used by state and local agencies to provide supplemental foods to participants. The Wisconsin WIC Program uses a retail food purchase system statewide.

<u>Food Grant</u> A grant award provided by USDA for the purchase of supplemental foods with drafts. These funds are expended when the drafts are processed through the banking system. The infant formula rebate is another source of food dollars, which actually offsets food costs.

<u>Food Instrument</u> Drafts are used by a participant to obtain supplemental foods.

<u>Food List</u> The list of foods authorized by the State WIC Office. These foods, which must meet the Federal WIC Regulations, provide nutrients most likely to be deficient in the WIC population. Criteria other than nutrients are also considered. It is also called the Wisconsin WIC Authorized Food List.

<u>FNS</u> The Food and Nutrition Service, a branch of the U.S. Department of Agriculture that administers the WIC Program.

<u>Food Packages</u> The supplemental foods selected for an individual WIC participant to receive each month which are tailored provide nutrients needed for the participant's current status.

Formula

<u>Contract Standard Infant Formulas</u> are those provided through an agreement with a formula manufacturer. These are the only formulas offered to infants except for the following conditions: 1) a physician prescribes a special formula, or 2) non-contract formula may be issued with a request from the physician if feeding practices seem appropriate and there seem to be no other causes of intolerance symptoms.



Non Contract Standard Infant Formulas are authorized WIC standard infant formulas other than the contract formulas.

<u>Standard Infant Formula</u> may be milk-based or soy-based formula. Standards for infant formulas are developed by the American Academy of Pediatrics Committee on Nutrition and are used by the Food and Drug Administration to develop infant formula regulations.

Non Contract Special Infant Formula are for infants, children or women with special nutritional needs such as tendency for allergies, deficient intestinal enzymes, intolerance to milk and soy-based formulas, or increased nutrient needs (premature infants or failure to thrive).

<u>Fraud</u> Intentionally making false statements, suppressing facts, giving information which misrepresents the true circumstances, or failing to give information about change in circumstances, to obtain WIC Program benefits.

<u>Graduate</u> WIC participants will graduate from the Program when during the recertification appointment it is found that their health and food habits have improved according to the standards used by WIC and a health or nutrition risk factor cannot be identified.

<u>Guardian</u> This is a legal term. This person, assigned by the courts, is usually a relative of the child and agrees to be the guardian for long term. The child's parents are usually neglecting, refusing or unable to carry out the duties of parenthood. Source: State Statutes 48.977 (2). This person may or may not be receiving monthly Wisconsin Kinship Care benefits. Foster parents are temporary legal guardians. See definitions for caregiver, parent and proxy.

<u>Health Services</u> Ongoing, routine pediatric and obstetric care (such as infant or child care, and prenatal or postpartum examinations) or referral for treatment.

<u>Hematological</u> Biochemical tests on blood, e.g., hematocrit or hemoglobin tests.

<u>Homeless Facility</u> Any of the following facilities which provide meal service; a supervised publicly or privately operated shelter designed to provide temporary living accommodations; a facility that provides a temporary residence for individuals intended to be institutionalized; a public or private place not designed for, or ordinarily used as a regular sleeping accommodation for human beings; and a temporary accommodation in the residence of another individual for not more than 365 days, except when it is culturally customary for families to live together.



<u>Homeless Individual</u> Woman, infant or child who lacks a fixed and regular nighttime residence or whose primary nighttime residence is a homeless facility (see above definition).

<u>Income Eligible</u> A person whose family income is within the WIC income poverty guidelines issued by the U.S. Department of Health and Human Services. These guidelines are adjusted annually, effective July 1 of each year.

Adjunctively eligible A participant is automatically eligible for the WIC Program when participating in one of the following programs: Food Stamps, Medicaid, Wisconsin Works (W-2), Temporary Assistance to Needy Families (TANF), or Food Distribution Program on Indian Reservations. (See Adjunctive Eligibility)

<u>Presumptively eligible</u> A pregnant woman with documented presumptive eligibility for Medicaid for outpatient services for a period of 60 days, is automatically eligible for the WIC Program. (See Presumptive Eligibility)

Infant Individuals under one year of age.

<u>Infant Formula Rebates</u> Through a competitive bidding process, the Division of Public Health, WIC Program contracts with one or more infant formula manufacturer(s) to provide a rebate for all contract liquid concentrate, powdered, and ready-to-feed milk-and soy-based, iron fortified infant formula purchased through WIC.

<u>Indirect Costs</u> Those costs that are incurred by an agency that are not readily chargeable to a particular program or function, but benefit all programs and functions operated by the agency.

<u>Initial Nutrition Education Contact</u> Nutrition counseling provided at (re)certification appointments. The counseling should be appropriate to the participant's identified nutritional needs.

Issuance Clinic (Issuance Site) The place where drafts are issued.

<u>Introduction of Solids/Juices</u> Any regular intake of food(s) other than formula or breastmilk, such as cereal, juice, etc. A single taste is not counted.

Local Agency An organization that the State Agency contracts with to provide services to participants in a project service area. Organizations may include: 1) A public health or human service agency or a private, nonprofit health or human service agency which provides health services, either directly, through contract or referral; 2) an Indian Health Service unit; 3) an Indian tribe, band, or group recognized by the U.S. Department of the Interior which operates a health clinic or is provided health services by an Indian Health Service unit; or 4) an intertribal council or group that is an authorized representative of



Indian tribes, bands, or groups recognized by the U.S. Department of the Interior, which operates a health clinic or is provided health services by an Indian Health Service unit. (See Project)

<u>Medical Equipment</u> All equipment necessary to determine the eligibility of persons (e.g., centrifuges, hemocues, infant measuring boards, and scales).

<u>Members of Populations</u> Persons with a common special need that do not necessarily reside in a specific geographic area, such as off reservation Native Americans or migrant families.

Migrant An individual whose principal employment is in agriculture on a seasonal basis, who has been employed within the last 24 months, and who establishes, for purposes of such employment, a temporary abode. A logger may be considered a migrant farm worker if both of these conditions are met because the harvesting of trees meets the definition of agriculture. An instream migrant is one who is currently in migrating status. Family members of this individual are also considered and coded as migrants.

<u>Monitoring</u> The process used by the State to review local projects to ensure compliance with Federal regulations and State policies and procedures.

Non-discrimination Statement All publications, outreach materials, handouts, referral materials, leaflets and brochures that identify or describe the WIC Program provided to participants must include the statement, "In accordance with Federal law and U. S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability. To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call (202) 720-5964 (voice and TDD). USDA is an equal opportunity provider and employer." The briefer statement, "This institution is an equal opportunity provider and employer" may be used for radio and television public service announcements, or when the material is too small to permit the full statement. The material must, at a minimum, include the statement in print size no smaller that the surrounding text.

No Show

<u>Draft pick up no show</u> - A participant who has not picked up a food package for that month.

<u>Certification appointment no show</u> - an applicant who fails to attend the scheduled certification appointment.

Nonprofit Agency A private agency which is exempt from income tax under the Internal Revenue Code.



<u>NSA</u> Nutrition Services and Administration is the portion of the federal WIC grant award that funds state and local administration for direct and indirect costs, excluding food costs, which the state and local agencies determine to be necessary to support WIC Program operations. Such costs include, but are not limited to, the cost of WIC Program administration, monitoring, auditing, nutrition education, outreach, certification, and printing drafts.

<u>Nutrition Contact</u> A personal exchange of nutrition information through group or individual interaction with an educator. See Initial Nutrition Education Contact and Secondary Education Contact.

<u>Nutrition Education</u> Individual or group nutrition education sessions designed to improve nutritional status, achieve positive change in dietary habits, and emphasize relationships between nutrition and health, all in keeping with the individual's personal, cultural, and socioeconomic preferences.

<u>Nutritional Risk</u> (1) A detrimental or abnormal nutrition condition detectable by biochemical or anthropometric measurements; (2) other documented nutritionally-related medical conditions; (3) dietary deficiencies that impair or endanger health; or (4) conditions that predispose persons to inadequate nutritional patterns or nutritionally related medical conditions. WIC risk factors, which are standardized by the State WIC Office, may be hematological (referring to the blood), anthropometric (measurements of weight and height), medical/predisposing (including diseases and chronic illnesses), or dietary (inadequate food intake). Different risk factors are identified for women, infants, and children.

<u>Parent</u> The biological or adoptive mother or father; step-parents (the spouse of the biological or adoptive parent) are considered parents. See the definitions for caregiver, guardian, and proxy.

<u>Participants</u> Pregnant, breastfeeding and postpartum women, infants (including breastfed infants whose mother is participating) and children under five who are receiving supplemental foods, nutrition counseling, and health screening.

<u>Participation</u> The number of WIC participants who receive drafts for one calendar month, including the number of infants breastfed by participating breastfeeding women.

<u>Physical Inventory</u> A current record of items purchased with WIC funds (state or local) that cost \$1000 or more, or sensitive assets.

<u>Postpartum Women</u> New mothers who are not breastfeeding an infant up to six months after termination of pregnancy (including miscarriage and abortion).

Pregnant Women Women determined to have one or more embryos or fetuses in utero.



<u>Prescreening</u> Determining if an applicant is categorically eligible, income eligible, and a resident of an authorized WIC project service area before making an appointment to screen for a nutritional risk factor.

Presumptive Eligibility A pregnant woman determined presumptively eligible (PE) for Medicaid may receive outpatient services to the end of the month following the month in which she was determined presumptively eligible. The woman is expected and advised to apply for Medicaid at the County or Tribal Social or Human Services Department. Documentation of presumptive eligibility is either a beige or a blue colored PE Card. The beige card is issued at the time of the application and the blue PE card is received by the woman within 5 to 7 days of applying for presumptive eligibility. Once determined eligible for Medicaid, a blue card is issued to the woman within 30 days. The Forward plastic card will replace the blue paper card in 1999.

Priority See Actual Priority and Probable Priority.

<u>Probable Priority</u> The initial assessment of the priority of an applicant used for placement on the waiting list or for scheduling an appointment.

<u>Program Benefits</u> The supplemental foods, nutrition education, and health screening provided to WIC participants.

<u>Program Income</u> Gross income earned by an agency through activities funded in part or whole by a grant from the State WIC Office, i.e., interest earned on advanced funds and charitable monetary contributions.

<u>Project</u> Any individual agency contracted with the DHFS, DPH to serve a geographic area or special population within the geographic boundaries of the State of Wisconsin, also known as a "local project." (See Local Agency)

<u>Project Number</u> An identification number assigned to each local project by the State WIC Agency.

<u>Project Service Area</u> The geographic area or population group which the State WIC Agency has approved for a project to serve.

<u>Proxy</u> Any person(s) authorized by a WIC project staff, woman participant, or by a parent, guardian or caregiver on behalf of an infant or child participant to pick up WIC drafts at the issuance site and/or spend drafts at an authorized vendor or Farmers' Market on behalf of a WIC participant. The proxy may be a social worker, health aide, neighbor, relative, baby sitter, or childcare provider. They may provide child care on a limited basis and may provide meals and snacks to the child. See definitions for caregiver, guardian and parent.



<u>Recertification</u> Assessing and documenting the eligibility of a participant applying for continuation of WIC benefits after a period of participation, which varies among participants due to their status: after an infant reaches one year; after each six-month period of participation for breastfeeding women and children. The recertification appointments may be scheduled to occur 30 days before or after the certification expiration date.

<u>Referrals</u> Those services to which a participant is directed for the purpose of providing medical, educational, or social assistance. The referral may be formal or informal.

Resident A person who lives in the authorized WIC project area.

<u>Retail Purchase</u> The type of food delivery system used in Wisconsin. Refers to store, market, pharmacy, etc., through which a participant purchases authorized foods.

<u>Secondary Education Contact</u> A nutrition or health education contact which includes a personal contact between qualified WIC staff and the participant and must occur on a day separate from the (re)certification appointment. The contact may be individual or in a group. Federal Regulations require the offering of relevant secondary nutrition education contacts.

<u>Sensitive Assets</u> Property with an acquisition cost of less than \$1,000 that is subject to risk of loss such as video recorders, cameras, computers, printers, and other portable theft-prone items.

<u>Social Security Income</u> Monthly income benefits are provided to retired workers or to their survivors when family earnings are decreased or cease due to retirement, disability, or death. See Supplemental Security Income (SSI) below.

<u>State WIC Office</u> Administering unit for the Wisconsin WIC Program, within the Department of Health and Family Services (DHFS), the Division of Public Health (DPH), Bureau of Family and Community Health (BFCH) and Nutrition Section. Also known as the State Agency.

<u>Status</u> All participants are assigned a "status" code for data collection and program accountability purpose. For example, there are three status codes for pregnant women based on the trimester enrolled.

<u>Supplemental Foods</u> Foods which meet the specifications required by the federal regulations. Supplemental foods are also called WIC foods, or WIC-authorized foods. They are "supplemental" because they "add to" the diet and are not intended to meet the participant's total nutritional needs.



<u>Supplemental Security Income (SSI)</u> Monthly disability income benefits are provided to people who have low incomes and few assets. To receive SSI, people must be living in the U.S.; be a U.S. citizen or be living in the U.S. legally; be 65 years of age or older; or blind; or disabled. Children may also receive SSI benefits due to blindness or disability.

<u>System Manual</u> This manual provides instructions and procedures for using the WIC data processing system, both the ADP and DAISy systems, pertaining to the day-to-day use of the system. This manual should be used in conjunction with the <u>Operations</u> Manual.

<u>TANF</u> Temporary Assistance to Needy Families replaces the Aid to Families with Dependent Children (AFDC). It is Title 1 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA). The federal block grant program provides states with the authority and funding to create programs that provide timelimited assistance to needy families with children and promote work. In Wisconsin, TANF is known as Wisconsin Works (W-2).

<u>Termination</u> The end of participation in WIC. A participant, a vendor, a clinic, or a project may be terminated from the Program.

<u>Three Full Fiscal Years</u> Three fiscal years plus 150 days; October 1 through February 28. The project is required to maintain all records and files pertinent to a WIC contract for this period of time. (Microfiche are considered legal records for retention purposes).

<u>Time Study</u> Documentation of time spent in each service category (administration, client services, immunization, nutrition education, and breastfeeding promotion and support) by each position paid by the WIC Program, including personnel and consultant/contractual).

<u>Transfer</u> A participant moving from one WIC project to another within a valid certification period is considered a transfer. The participant may be moving within the state or from out-of-state.

<u>Trimonthly Draft Issuance</u> A system of offering food drafts to participants for a three month period.

<u>United State Department of Agriculture (USDA)</u> The USDA is the federal agency which funds and administers WIC.

<u>Vendor</u> The retail outlet that sells the WIC foods to the WIC participant. To become a WIC vendor, a store must apply to the State WIC Office for authorization and must sign a



contract agreeing to abide by certain rules and regulations. State or local WIC project staff train and monitor the local vendors.

<u>Vendor/Participant Collections</u> Refund of overpayments or improper payments by vendors or participants.

<u>VOC Card</u> In Wisconsin, the Verification of Certification Card is the Identification Folder. The VOC is a federal WIC term used for the document that contains participant information which is accepted as proof of eligibility for program benefits and is valid until the certification period expires. Required information includes the participant's name, date of certification and income eligibility, the nutrition risk factor, certification expiration date, signature and printed name of the local agency official, name and address of the agency, and identification number.

<u>Waiting List</u> The list of persons who are categorically eligible, income eligible, and a resident of an approved local project area but not enrolled due to the project being at full caseload.

<u>WIC Approved Foods</u> Those foods which meet the specifications established by the federal WIC legislation and the Wisconsin WIC Program. Also called supplemental foods or WIC Authorized Foods.

<u>WIC Program</u> WIC is an acronym for the Special Supplemental Nutrition Program for Women, Infants and Children, authorized by Section 17 of the Child Nutrition Act of 1966, as amended.

<u>Wisconsin WIC Program</u> The total of all local WIC Projects, and the State WIC Office's administrative units and DPH Regional Offices responsible for the operation and management of local WIC Projects in Wisconsin.

<u>Wisconsin Works (W-2)</u> This is the welfare replacement program for Aid to Families with Dependent Children (AFDC) based on work participation. Under W-2 there is no entitlement to assistance, but a place for everyone who is willing to work to their ability. The program is available to all parents with minor children, low assets and low income. Each W-2 eligible participant meets with a Financial and Employment Planner (FEP), who helps the person develop a self-sufficiency plan and determine their place on the W-2 employment ladder. The ladder consists of four levels of employment and training options, in order of preference: Unsubsidized Employment; Trial Jobs (subsidized employment); Community Service Jobs (CSJs); and W-2 Transition.